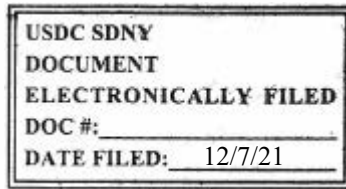


PERKINScoie



1155 Avenue of the Americas  
22nd Floor  
New York, NY 10036-2711

T +1.212.262.6900  
F +1.212.977.1649  
PerkinsCoie.com

December 7, 2021

Martin E. Gilmore  
MGilmore@perkinscoie.com  
D. +1.212.261.6814  
F. +1.212.977.1640

**VIA ECF**

Judge Alison J. Nathan  
United States District Judge  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

**Re: *Bobcar Media LLC v. Deutsche Telekom AG et al.*, 1:21-cv-05685-AJN (S.D.N.Y.)**

Dear Judge Nathan:

This firm represents T-Mobile USA, Inc. ("T-Mobile") in the above-referenced action. I write to request that T-Mobile and Samsung Electronics America, Inc. ("Samsung") be given a 30-day extension to move, answer, or otherwise respond to Plaintiff's complaint. Defendants T-Mobile and Samsung were served on September 21, initially making their responses due October 12, and previously received a 60-day extension to December 13. T-Mobile's and Samsung's respective foreign affiliates, Deutsche Telekom and Samsung Electronics Co. Ltd., have not yet been served. With the extension, the new response date would be January 12, 2022.

SO ORDERED.

Samsung recently retained counsel, and the parties are continuing to negotiate a disposition for the foreign affiliates without burdening the court with motion practice. This is the second request for an extension of time to answer. Counsel for Plaintiff has consented to the extension, as has counsel for Samsung, who will make an appearance in this matter shortly.

Respectfully submitted,

/s/ Martin E. Gilmore

Martin E. Gilmore

cc: counsel of record via ECF  
Christopher Burrell, Esq., counsel f

A handwritten signature of Alison J. Nathan in black ink, enclosed in a rectangular box. Below the signature, the text "SO ORDERED. ALISON J. NATHAN, U.S.D.J." is printed. To the right of the signature, the date "12/7/21" is handwritten.

SO ORDERED.  
ALISON J. NATHAN, U.S.D.J.  
12/7/21